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2 **ANDERSON & ASSOCIATES**
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5 Attorney for Plaintiff
ALEXANDRE SINIOUGUINE
6

7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10

11 ALEXANDRE SINIOUGUINE,
individually,

12 Plaintiff,
13

14 v.
15

16 MEDIACHASE, LTD., a Delaware
corporation; CHRIS LUTZ,
17 individually; JULIE MAGBOJOS, 10
individually; and DOES 1 through 20,
inclusive,

18 Defendants.
19
20
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Docket No.

CV11-06113 JFW (ABRx)

PLAINTIFF'S COMPLAINT FOR:

1. **COPYRIGHT INFRINGEMENT**
2. **ACCOUNTING**
3. **DECLARATORY RELIEF**
4. **DEMAND FOR JURY TRIAL**

1 Plaintiff, ALEXANDRE SINIOUGUINE (“Plaintiff” or “SINIOUGUINE”),
2 by and through his undersigned counsel of record, alleges as follows:
3

4 **JURISDICTION AND VENUE**
5

6 1. This is an action for copyright infringement of a computer software
7 program authored and owned by Plaintiff and is brought under the federal Copyright
8 Act of 1976, as amended, 17 U.S.C.A. §§ 101 et seq. This court has jurisdiction
9 pursuant to 28 U.S.C.A. §1338(a).
10

11 2. Venue lies in the Central District of California and is conferred by 28
12 U.S.C.A. §§ 1391(c) and 1400(a), as Defendants and their agents do business, reside
13 and may be found in this district.

14 **PARTIES**
15

16 3. Plaintiff SINIOUGUINE is now, and at all times mentioned in this
17 complaint was, a resident of the County of Los Angeles, in the State of California.
18

19 4. Plaintiff is informed and believes and thereon alleges that Defendant
20 MEDIACHASE, LTD. (hereinafter “MEDIACHASE”) is now, and at all times
21 mentioned in this complaint was, a corporation organized and existing under the laws
22 of the State of Delaware with its principal place of business at 8447 Wilshire
23 Boulevard, Suite 201, Beverly Hills, CA 90211. Plaintiff is further informed and
24 believes and thereon alleges that Defendant MEDIACHASE is engaged in the
25 business of reproducing, selling and distributing, among other things, computer
26 software, primarily through its website, “www.mediachase.com.”
27

28 5. Plaintiff is informed and believes and thereon alleges that Defendant

1 CHRIS LUTZ (hereinafter "LUTZ") is now, and at all times mentioned in this
2 complaint was, a resident of the State of California, County of Los Angeles. Plaintiff
3 further alleges that LUTZ is, and at all times mentioned in this complaint was, a
4 principal and/or agent of MEDIACHASE.

5
6 6. Plaintiff is informed and believes and thereon alleges that Defendant JULIE
7 MAGBOJOS (hereinafter "MAGBOJOS") is now, and at all times mentioned in this
8 complaint was, a resident of the State of California, County of Los Angeles. Plaintiff
9 further alleges that MAGBOJOS is, and at all times mentioned in this complaint was,
10 a principal and/or agent of MEDIACHASE.

11
12 7. The true names and capacities, whether individual, corporate, associate or
13 otherwise, of defendants sued herein as DOES 1 through ¹⁰~~20~~, inclusive, are unknown
14 to Plaintiff who therefore sues those defendants by such fictitious names. Plaintiff
15 will amend
16 this complaint to insert the true names and capacities of such DOE defendants when
17 the same have been ascertained.

18
19 8. Plaintiff is informed and believes, and thereon alleges that each defendant
20 designated herein as a DOE is responsible in some manner for the occurrences and
21 events herein alleged and that Plaintiff's damages were proximately caused by their
22 conduct.

23
24 9. Plaintiff is informed and believes, and thereon alleges that unless otherwise
25 specifically mentioned, each defendant was an agent and/or employee of each of the
26 remaining defendants, and that in doing the things complained of herein was acting
27 within the course and scope of such agency and/or employment.

10. Defendants MEDIACHASE, LUTZ, MAGBOJOS and DOES 1 through 20, inclusive, are hereinafter collectively referred to as “Defendants.”

FACTS COMMON TO ALL CLAIMS FOR RELIEF

11. This action concerns the unlawful reproduction, marketing, distribution and sale of, among others, the computer software most commonly referred to as eCommerce Framework and all of its versions and derivatives (hereinafter “ECF”). ECF was the original effort of Plaintiff and represented the use of his skill, judgment and labor, and as such is an original work of authorship, suitable for copyright protection as a literary work under United States copyright laws.

12. Plaintiff SINIOUGUINE is a creator and designer of computer software. Sometime in 2004, Plaintiff authored and created an original computer program most commonly referred to as ECF. The rights of reproduction, preparation of derivative works, and sale and distribution of copies of ECF all belong exclusively to Plaintiff SINIOUGUINE as author and creator of the software.

13. On August 11, 2004, Plaintiff fixed ECF in a tangible form as a ZIP file, stored on the hard drive of Plaintiff’s personal computer. Since then, from 2004 through and including March 2011, Plaintiff has tirelessly continued to develop, modify and program ECF, ultimately authoring, creating, designing, developing and programming all other versions, the most recent being version 5.2 (hereinafter “ECF 5.2”), completed in March of 2011.

14. On June 29, 2011, Plaintiff SINIOUGUINE applied online for copyright registration with the United States Copyright Office for the software ECF, a true and correct copy of which is attached as Exhibit A and incorporated by reference. The

1 Copyright Office received this application, and sent Plaintiff via email an
2 Acknowledgment of Receipt, a true and correct copy of which is attached as Exhibit
3 B and incorporated by reference.
4

5 15. Plaintiff SINIOUGUINE alleges on information and belief that on or
6 about 2004, Defendants, and each of them, began marketing, reproducing, selling
7 and distributing a ZIP file containing software identical to ECF as originally
8 authored and created by Plaintiff. Plaintiff is informed and believes on thereon
9 alleges that by March 2011, Defendants, and each of them, were earning
10 approximately \$200,000.00 - \$250,000.00 per month from the marking,
11 reproduction, sale and distribution of ECF. Defendants, and each of them, have kept
12 and continue to keep all profits and proceeds resulting from their unauthorized use
13 and sale of ECF.
14

15 16. On or about March 18, 2011, Plaintiff SINIOUGUINE issued a cease and
16 desist letter to Defendant LUTZ, notifying Defendant LUTZ that Defendants, and
17 each of them, have infringed, and are infringing, the copyright of Plaintiff.
18

19 17. Thereafter, Defendants, and each of them, knowingly and willfully
20 infringed, and continue to infringe, Plaintiff SINIOUGUINE's copyrights by
21 continuing to reproduce, sell, offer for sale, and distribute ECF within the United
22 States and elsewhere without Plaintiff's lawful permission and in complete disregard
23 of Plaintiff's rights.
24

25 18. On March 31, 2011, Defendant MEDIACHASE registered ECF with the
26 United States Copyright Office. In that registration, Defendant MEDIACHASE
27 falsely and illegally represented that Defendant MEDIACHASE is the owner and
28 author of the copyright for ECF, despite knowing that Plaintiff SINIOUGUINE was

1 the copyright author and owner.

2
3 19. In doing these wrongful acts, Defendants, and each of them, have been
4 guilty of malice, oppression, fraud and willful disregard of Plaintiff
5 SINIOUGUINE's rights.

6
7 **FIRST CLAIM FOR COPYRIGHT INFRINGEMENT**

8 **(Against All Defendants)**

9
10 20. Plaintiff SINIOUGUINE realleges and fully incorporates herein by
11 reference each and every allegation contained in Paragraphs 1 through 19, inclusive.

12
13 21. ECF was created independently in 2004. ECF is a wholly original end-to-
14 end .NET development framework, tailored for ecommerce purposes. The software
15 provides a framework that programmers can build upon based on a business's
16 specific needs. As an original work of authorship, the software ECF is within the
17 subject matter of copyright.

18
19 22. Plaintiff SINIOUGUINE authored and created ECF in 2004. On or about
20 August 11, 2204, Plaintiff fixed ECF in a tangible form as a ZIP file on the hard
21 drive of Plaintiff's personal computer. Plaintiff applied for registration for ECF, and
22 deposited a copy of ECF, with the United States Copyright Office on June 29, 2011.
23 In doing so, Plaintiff has complied with the Copyright Act's requirements of fixation,
24 registration, and deposit with respect to ECF.

25
26 23. As author and creator of ECF, Plaintiff SINIOUGUINE is the legal and
27 equitable owner of all of the copyright in ECF.

24. By the actions alleged above, Defendants, and each of them, have willfully infringed and will continue to infringe upon Plaintiff SINIOUGUINE's rights in and related to the software ECF and its derivatives by marketing, reproducing, selling and distributing copies of ECF without Plaintiff SINIOUGUINE's lawful authorization or consent and by unlawfully registering ECF with the United States Copyright Office, falsely claiming Defendant MEDIACHASE as the author and owner of ECF.

25. The willful and wrongful conduct of Defendants, and each of them, diminish the revenues which Plaintiff would otherwise receive from his authorized exploitation of such programs; it causes harm, damage and injury to Plaintiff's reputation in Defendants' failure to properly credit Plaintiff SINIOUGUINE as author and owner of ECF; and it has and will continue to injure Plaintiff's relations with present and prospective customers. Much of this damage is irreparable.

26. Plaintiff SINIOUGUINE has no adequate remedy at law to redress all of the injuries that Defendants have caused, intend to cause, and continue to cause by their willful and wrongful conduct. Plaintiff will continue to suffer irreparable damages and sustain lost profits until Defendants' actions as alleged herein are enjoined by this Court. This Court is authorized to enjoin Defendants under 17 U.S.C.A. § 502.

SECOND CLAIM FOR ACCOUNTING

(Against All Defendants)

27. Plaintiff SINIOUGUINE realleges and fully incorporates herein by reference each and every allegation contained in Paragraphs 1 through 19, inclusive, and Paragraphs 21 through 26, inclusive, of the First Cause of Action.

1
2 28. Plaintiff SINIOUGUINE alleges on information and belief that on or
3 about 2004, Defendants, and each of them, began marketing, reproducing, selling
4 and distributing ECF as a ZIP file via Defendant MEDIACHASE's website,
5 "www.mediachase.com;" beginning in 2008, via the Amazon Simple Storage Service
6 website (hereinafter "Amazon S3"); and possibly through other venues and means
7 that Plaintiff is not aware of at this time. These ZIP files contained ECF, the creation
8 and work of Plaintiff SINIOUGUINE.

9
10 29. Defendants, and each of them, have at all times kept, and continue to keep,
11 all profits and proceeds from the unauthorized marketing, reproduction, sale and
12 distribution of ECF for themselves. Defendants have refused and continue to refuse
13 to account for, or pay to, Plaintiff amounts due to him as owner, author and creator of
14 ECF.

15
16 30. The exact amount of monies received and profits gained by Defendants,
17 and each of them, since 2004 is unknown to Plaintiff and can only be determined by
18 an accounting.

19
20 **THIRD CLAIM FOR DECLARATORY RELIEF**

21 **(Against All Defendants)**

22
23 31. Plaintiff SINIOUGUINE realleges and fully incorporates herein by
24 reference each and every allegation contained in Paragraphs 1 through 19, inclusive,
25 and Paragraphs 21 through 26, inclusive, of the First Cause of Action, and Paragraph
26 28 through 30, inclusive, of the Second Cause of Action.

27
28 32. Despite having knowledge that Plaintiff SINIOUGUINE authored and

1 created the ECF software in 2004 as well as subsequent versions, and fixed the ECF
2 software as a ZIP file as early as August 11, 2004 Defendants, and each of them,
3 after receipt of Plaintiff's cease and desist letter, registered ECF with the United
4 States Copyright Office on March 31, 2011, falsely and illegally representing
5 Defendant MEDIACHASE as the author and creator of ECF.

6
7 33. Pursuant to 28 U.S.C.A. § 2201, Plaintiff SINIOUGUINE is entitled to
8 declaratory relief, declaring Plaintiff as the true and rightful owner of the copyright
9 of ECF and holder of all rights and interests related to ECF.

10
11 **PRAYER FOR RELIEF**

12
13 **WHEREFORE**, Plaintiff SINIOUGUINE requests judgment against
14 Defendants, and each of them, as follows:

15
16 **AS TO THE FIRST CLAIM FOR RELIEF FOR COPYRIGHT**
17 **INFRINGEMENT:**

18
19 1. Actual damages suffered by Plaintiff as a result of the infringement of
20 Defendants, in an amount to be determined according to proof at trial, and/or
21 statutory damages pursuant to 17 U.S.C.A. §504(c) based upon Defendants' willful
22 acts of infringement;

23
24 2. Damages suffered by Plaintiff SINIOUGUINE of, all profits
25 derived by Defendants as a result of their infringement of Plaintiff's copyrights;

26
27 3. Declaratory relief, pursuant to 28 U.S.C.A. § 2201(a), declaring Plaintiff
28 as the true and rightful owner of the copyright of the software ECF and holder of all

1 rights and interests related to ECF;

2
3 4. A permanent injunction, pursuant to 17 U.S.C.A. § 502, enjoining the
4 Defendants and their agents, servants and employees from infringing in any manner
5 the copyrights of Plaintiff SINIOUGUINE in the software ECF and from publishing,
6 producing, selling, marketing, preparing derivative works of, and distributing any
7 copies of any version of the software ECF following a final decision in this action;

8
9 5. Pursuant to 17 U.S.C.A. § 503(b), the delivery by Defendants, their agents,
10 employees and all holding with, through, or under them, or anyone acting on their
11 behalf, for destruction following a final decision in this action, of all infringing
12 copies or devices, as well as all and any means for making infringing copies.

13
14 **AS TO THE SECOND CLAIM FOR RELIEF FOR AN ACCOUNTING:**

15
16 1. An accounting for, and payment to Plaintiff SINIOUGUINE of, all
17 payments, royalties and/or profits and advantages derived by Defendants as a result
18 of their infringement of Plaintiff's copyrights.

19
20 **AS TO THE THIRD CLAIM FOR DECLARATORY RELIEF:**

21 1. Declaratory relief, pursuant to 28 U.S.C.A. § 2201(a), declaring Plaintiff
22 as the
23 true and rightful owner of the copyright of the software ECF and holder of all rights
24 and interests related to ECF.

25
26 **ON ALL CAUSES OF ACTION:**

27
28 1. Reasonable attorneys fees;

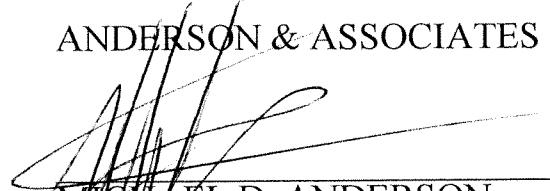
1 2. The costs of this action; and

2
3 3. Such other and further relief as the court deems proper.

4
5 DATED: July 22, 2011

Respectfully submitted,

ANDERSON & ASSOCIATES

7
8 
9 MICHAEL D. ANDERSON
10 Attorney for Plaintiff
11 ALEXANDRE SINIOUGUINE

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands a jury trial of all issues raised in this Complaint.

DATED: July 22, 2011

Respectfully submitted,

ANDERSON & ASSOCIATES



MICHAEL D. ANDERSON
Attorney for Plaintiff
ALEXANDRE SINIOUGUINE

Exhibit A

-APPLICATION-

Title

Title of Work: eCommerce Framework
Previous or Alternative Title: ECF
.NET eCommerce Framework
ASP.NET eCommerce Framework
eCommerce Framework 1.0
eCommerce Framework 2.0
eCommerce Framework 3.0
eCommerce Framework 3.1
eCommerce Framework 4.0
eCommerce Framework 4.1
eCommerce Framework 4.2
eCommerce Framework 5.0
eCommerce Framework 5.1
eCommerce Framework 5.2
eCommerce Framework G5

Completion/Publication

Year of Completion: 2004
Date of 1st Publication: August 11, 2004 **Nation of 1st Publication:** United States

Author

■ **Author:** Alexandre Siniouguine
Author Created: text, computer program
Work made for hire: No
Citizen of: Russia (Federation) **Domiciled in:** United States
Year Born: 1979

Copyright claimant

Copyright Claimant: Alexandre Siniouguine

801 N. Fairfax Ave PH2, Los Angeles, CA, 90046, United States

Limitation of copyright claim

Material excluded from this claim: artwork

Previous registration and year: TX0007329315 2011

New material included in claim: text, computer program

Rights and Permissions

Name: Alexandre Siniouguine

Email: sasha.la@gmail.com

Telephone: 323-788-0902

Address: 801 N. Fairfax Ave PH2

Los Angeles, CA 90046 United States

Certification

Name: Alexandre Siniouguine

Date: June 29, 2011

Registration #:

Service Request #: 1-624698228

Priority: Routine

Application Date: June 29, 2011 02:18:56 PM

Note to C.O.: This is the first application submitted by this author as copyright claimant. Previous registration number:
Registration Number: TX0007329315. Year of registration: 2011-03-31

Correspondent

Name: Alexandre Siniouguine

Email: sasha.la@gmail.com

Telephone: 323-788-0902

Address: 801 N. Fairfax Ave PH2
Los Angeles, CA 90046 United States

Mail Certificate

Alexandre Siniouguine
801 N. Fairfax Ave PH2
Los Angeles, CA 90046 United States

Exhibit B

----- Forwarded message -----
From: Copyright Office <cop-rc@loc.gov>
Date: Wed, Jun 29, 2011 at 11:18 AM
Subject: Acknowledgement of Receipt
To: sasha.la@gmail.com

THIS IS AN AUTOMATED EMAIL - DO NOT REPLY.

Thank you for submitting your registration claim using the electronic Copyright Office (eCO) System. This email confirms that your application and fee for the work eCommerce Framework was received on 06/29/2011. The following applies to registration claims only (not preregistrations):

The effective date of registration is established when the application, fee AND the material being registered have been received.
If you have not yet sent the material to be registered, logon to eCO and click the blue case number associated with your claim in the Open Cases table, then do one of the following:

For digital uploads: Click the Upload Deposit button at the top of the Case Summary screen, then browse and select the file(s) you wish to upload. Note: only certain classes of works may be registered with digital deposits (See FAQs: http://www.copyright.gov/eco/faq.html#eCO_1.4).

For hardcopy submissions: Click the Create Shipping Slip button at the top of the Case Summary screen, then click the Shipping Slip link that appears in the Send By Mail table. Print out and attach the shipping slip to the copy(ies) of your work. For multiple works, be sure to attach shipping slips to the corresponding copies.

A printable copy of the application will be available within 24 hours of its receipt. To access the application, click the My Applications link in the left top most navigation menu of the Home screen.

You will be issued a paper certificate by mail after the registration has been completed. You may check the status of this claim via eCO using this number [1-624698228].

[THREAD ID: 1-AEEC8R]

United States Copyright Office

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge John F. Walter and the assigned discovery Magistrate Judge is Alicia G. Rosenberg.

The case number on all documents filed with the Court should read as follows:

CV11- 6113 JFW (AGR~~x~~)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Name & Address:

Michael D. Anderson, Esq. [SBN 194493]
mda@a-a-law.com
Anderson & Associates
140 S. Lake Avenue, Suite 372
Pasadena, CA 91101

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ALEXANDRE SINIOUGUINE, individually,

CASE NUMBER

PLAINTIFF(S)

CV11-06113 JFW(ABPx)

v.

MEDIACHASE, LTD., a Delaware corporation;
CHRIS LUTZ, individually; JULIE MAGBOJOS,
individually; and DOES 1 through 10, inclusive

DEFENDANT(S).

SUMMONS

TO: DEFENDANT(S): MEDIACHASE, LTD., a Delaware corporation; CHRIS LUTZ, individually;
JULIE MAGBOJOS, individually; and DOES 1 through 10, inclusive

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Michael D. Anderson, Esq., whose address is 140 S. Lake Avenue, Suite 372, Pasadena, CA 91101. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

JUL 25 2011

Dated: _____

Clerk, U.S. District Court

By: _____

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) ALEXANDRE SINOUGUINE, individually		DEFENDANTS MEDIACHASE, LTD., a Delaware Corporation CHRIS LUTZ, individually; JULIE MAGBOJOS, individually; and DOES 1 through 20, inclusive.	
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Michael D. Anderson, Esq [SBN 194493] 140 S. Lake Avenue, Suite 372 Pasadena, CA 91101 email: mda@a-a-law.com		Attorneys (If Known)	

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:40%;">Citizen of This State</td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:30%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td></td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td></td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF		<input type="checkbox"/> 1	<input type="checkbox"/> 1		<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF																				
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Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify): _____
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: **JURY DEMAND:** ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 17 U.S.C.A. §§ 101, et seq. This is a claim for copyright infringement.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV11-06113

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETVIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.

☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Alexandre Siniouguine - Los Angeles County	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.

☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Medicachase, Ltd. - Los Angeles County	
Chris Lutz - Los Angeles County	
Julie Magbojos - Los Angeles County	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.

Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Copyright Infringement - Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date July 22, 2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))